

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

April 26, 1991

R.M. Nelson, Jr.
Manager
DOE, RFO

Attn: T. Lukow

FIFRA CORRECTIVE ACTION PLAN (2313) - JMK-0002-91

Ref: D.P. Simonson ltr (0811) to J.M. Kersh, Federal Insecticide, Fungicide and
Rodenticide Act Surveillance, April 2, 1991As requested in the above referenced letter, please find below the completed FIFRA
Corrective Action Plan for your review.

FIFRA CORRECTIVE ACTION PLAN

The following seven corrective actions address deficiencies that were identified in the
Department of Energy FY91 surveillance of compliance of Rocky Flats with the
requirements of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). DOE
recommendations are listed with EG&G corrective actions following.

DOE Recommendation #1:

Assign the overall program responsibility to a single organizational unit. In addition,
assign specific functional responsibilities, as necessary, to the other involved
organizational units, but implement an oversight process.

EG&G Corrective Action:

The overall FIFRA compliance responsibility will reside in the Permitting and Compliance
department. Permitting and Compliance will appoint a FIFRA program manager to provide
for the oversight of this program. The FIFRA Program Manager will implement the oversight
process and assign each of the specific functional responsibilities. Completion date
May 17, 1991.

DOE Recommendation #2:

Develop a central filing and record system for all pesticide acquisitions and applications.
Develop procedures for how that record system is to be maintained and assign
responsibility for that maintenance.

EG&G Corrective Action:

The central filing and record system will be developed and maintained by the FIFRA
Program Manager. Completion date July 31, 1991.

ADMIN RECCRD

SW-A-002944

DIST.	LTR	ENC
ALHOFF, F.H.		
WETZKE, J.C.		
WELINGAME, A.H.		
BUCHER, D.W.		
WIS, J.G.		
BERED, J.E.	X	
PERERA, D.W.		
PERERA, K.P.		
BRIS, L.R.		
BAIKOR, F.J.		
FRANCIS, G.E.	X	
WOODWIN, R.		
SEALY, T.J.		
DEKER, E.H.		
SENS, J.P.		
KERSH, J.M.		
BRBY, W.A.		
KIRKEBO, J.A.		
EE, E.M.	X	
MAJESTIC, J.R.		
DANIEL, M.G.		
MEURRENS, B.E.		
MONTROSS, R.W.		
MORGAN, R.V.	X	
NORTH, P.		
PALMER, L.A.		
PARNELL, R.F.		
POTTER, G.I.	X	
PUZZITO, V.M.		
RHOADES, J.I.	X	
CAFFELL, B.F.		
SHANNON, W.M.		
SWANSON, E.R.		
VIEBE, J.S.		
WILKINSON, R.B.		
WILSON, J.M.		
YOUNG, E.R.		
LANE, J.O.	X	
Schubert, A.I.	X	
Walters, D.F.	X	
Wetzel, C.D.	X	
Wetzel, A.A.	X	
Wetzel, R.W.	X	
Wetzel, M.I.	X	
Wetzel, J.A.	X	
Wetzel, T.L.	X	
Wetzel, R.R.	X	
CORRESPONDENCE CONTROL	X	X
TRAFFIC		
Equipment Tracking	X	

CLASSIFICATION:

UCNI	
UNCLASSIFIED	X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER

SIGNATURE

DATE

IN REPLY TO LTR NO.

PCs
LTR APPROVALS: 4-26-91

ORIG & TYPIST INITIALS

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DOE Recommendation #3:

Ensure that the use of pesticides on RFP is included in the sitewide EIS, which is currently being developed. Consider whether there is an urgent need to utilize pesticides prior to the completion of the EIS and if so, prepare the appropriate Environmental Assessment.

EG&G Corrective Action:

The FIFRA Program Manager will direct the NEPA group to include all uses of pesticides, and all other FIFRA regulated products in the sitewide EIS. Also, all uses of pesticides, urgent or otherwise, will be discouraged as much as possible until such time that they are included in the EIS. If the need to use pesticides arises prior to completion of the EIS, appropriate environmental documentation will be prepared.

DOE Recommendation #4 -

Correct the storage problem in Building 331 where wasp spray is stored with other products that have a similar label.

EG&G Corrective Action:

The storage problem has been corrected by the addition of a separate divider to reduce the possibility of inadvertent usage with similar labelled products. In addition, the FIFRA Program Manager will order and post "DANGER", "PESTICIDE", and "POISON" labels for the cabinet. Completion date July 1, 1991.

DOE Recommendation #5:

Find "missing" Building 667 and determine whether pesticide residues may exist on site.

EG&G Corrective Action:

The location of Building 667 has been indentified, and the FIFRA Program Manager will implement a pesticide sampling plan to check for possible past contamination. Completion date October 1, 1991.

DOE Recommendation #6:

Develop a schedule for preparing a plantwide Integrated Pest Management Plan. This plan will help ensure that all pesticides used at Rocky Flats will be in compliance with FIFRA.

EG&G Corrective Action:

The FIFRA Program Manager will develop a plantwide Integrated Pest Management Plan in concert with Environmental Restoration. Completion date October 1, 1991.

DOE Recommendation #7:

Once the supply of Nalco 2810 biocide is exhausted (expected by the end of summer), consider using chlorine bleach as the preferred method of treating algae growth in the swamp coolers and cooling towers.

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EG&G Corrective Action:

The FIFRA Program Manager will institute a policy addressing the use of biocides in treating algae growth in swamp coolers and cooling towers. Completion date June 1, 1991.

If you have any questions, please contact A.A. Church at extension 7825.



J.M. Kersh
Associate General Manager
Environmental and Waste Management

DEK:kam

Orig. and 1 cc: - R.M. Nelson, Jr.